

MAR 31 2022 JC

UNITED STATES DISTRICT COURT

for the

District of

Division

BY

 AT SEATTLE
 CLERK U.S. DISTRICT COURT
 WESTERN DISTRICT OF WASHINGTON
 DEPUTY

 22 CV - 00409 -
 Case No. (to be filled in by the Clerk's Office) TLF

Ezra Alem

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

See attached

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

COMPLAINT AND REQUEST FOR INJUNCTION

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	Ezra Alen
Street Address	1001 East James Way
City and County	Seattle King
State and Zip Code	Washington 98122
Telephone Number	(425) 517-9126
E-mail Address	Ezra.a.t21@gmail.com

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name	William Ter-veen
Job or Title <i>(if known)</i>	Snohomish Deputy
Street Address	3000 Rockefeller Ave #Ms606
City and County	Everett Snohomish
State and Zip Code	Washington 98201
Telephone Number	(425) 383-3393
E-mail Address <i>(if known)</i>	

Defendant No. 2

Name	Constance M. Crawley
Job or Title <i>(if known)</i>	Snohomish County Prosecuting Attorney
Street Address	3000 Rockefeller Ave
City and County	Everett Snohomish
State and Zip Code	Washington 98201
Telephone Number	(425) 388-3333
E-mail Address <i>(if known)</i>	

Defendant No. 3

Name	Donald M. Voiret
Job or Title <i>(if known)</i>	Special Agent in Charge
Street Address	1110 3 rd Ave
City and County	Seattle King
State and Zip Code	Washington 98101
Telephone Number	(206) 622-0460
E-mail Address <i>(if known)</i>	

Defendant No. 4

Name	
Job or Title <i>(if known)</i>	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address <i>(if known)</i>	

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*

☒ Federal question

☐ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

14 Amendment and the 5th admendment under the Due Process Clause, False Claims act, Policce Misconduct, Prosecutorial Misconduct

B. If the Basis for Jurisdiction Is Diversity of Citizenship**1. The Plaintiff(s)****a. If the plaintiff is an individual**

The plaintiff, *(name)* Ezra Alem, is a citizen of the State of *(name)* Washington.

b. If the plaintiff is a corporation

The plaintiff, *(name)*, is incorporated under the laws of the State of *(name)*, and has its principal place of business in the State of *(name)*.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)**a. If the defendant is an individual**

The defendant, *(name)* See Attached, is a citizen of the State of *(name)*. Or is a citizen of *(foreign nation)*.

b. If the defendant is a corporation

The defendant, (name) _____, is incorporated under the laws of the State of (name) _____, and has its principal place of business in the State of (name) _____.
Or is incorporated under the laws of (foreign nation) _____, and has its principal place of business in (name) _____.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because *(explain)*:

10,000,000.00

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the injunction or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

A. Where did the events giving rise to your claim(s) occur?

The original event took place in Snohomish County, Arlington but continues to be a national issue and international issue.

B. What date and approximate time did the events giving rise to your claim(s) occur?

Originally 10/09/2013, and currently (as of 03/31/2022)

- C. What are the facts underlying your claim(s)? *(For example: What happened to you? Who did what? Was anyone else involved? Who else saw what happened?)*

William Ter-Veen falsely stated to the sheriff department regarding to the alleged claim of threatening law enforcement by utilizing military forces. William Ter-Veen also claimed that I was aware of the situation, and also stated that I did not threaten or make any threats in his report and goes on to claim that I did. The Snohomish County Prosecutor, Constance M. Crawley, filed and used the alleged claim of an assault 4 that had nothing to do with the law enforcement and was extremely unnecessary for it being used against to in the efforts of placing me on the cautionary list, without proof, without witnesses, without, varification and certification of witness statement and William Ter-Veen coaching the witness into creating a narrative of the incident. in which the FBI took the case with ease and caused an extreme situation for negative outcomes of interactions from the federal agencies, local agencies, and international agencies.

IV. Irreparable Injury

Explain why monetary damages at a later time would not adequately compensate you for the injuries you sustained, are sustaining, or will sustain as a result of the events described above, or why such compensation could not be measured.

The continuation of being placed on the cautionary watchlist indefinitely is creating a situation that will make my life difficult to live with in the US. and other countries, if it goes to show that the law placed me on a cautionary list. the continuation of the issue, since 10/09/2013 has created a negative and unnecessary experience within other law agencies where I was falsely detained, used the files against, and deceived the court of my activities in the process of gaining the benefit of putting me in jail. The continuation of the wrongful placement within the NCIC database creates an impossible chance of being a victim of crimes and difficulty of living without fear of retaliation and or harmful experience from future enjoyment of my life and the freedom of being able to pursuit my happiness since there is no legal ramification or any possible appeal or challenging the cautionary watchlist.

V. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

The continuation of the placement on the cautionary watchlist has, currently as of 03/31/22, has caused me difficulties of mental health and extremely fearful for my life. The continuation of the issue has created a harship in my employment opportunities, being able to feel safe to walk out my door, being harmed by other people causing me trouble but the fear of being a victim of police falsely claiming me the suspect of my own victimizations creates fear of imprisonment and potential for law enforcement to allege me of doing additional crimes by simply claiming that I falsely threatened them or the fear of law enforcement had drawn weapons towards my direction. my fear for my life continues to cause an indefinate traumatizing experience and prevents me from being able to sleep, concentrate on my school, creating PTSD everytime I hear sirens, any interactions with law enforcement, creates a continuation of fear by being near people with uniforms.

VI. Certification and Closing

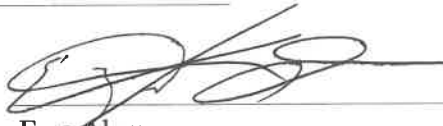
Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 03/31/2022

Signature of Plaintiff



Printed Name of Plaintiff

Ezra Alem

B. For Attorneys

Date of signing: _____

Signature of Attorney _____

Printed Name of Attorney _____

Bar Number _____

Name of Law Firm _____

Street Address _____

State and Zip Code _____

Telephone Number _____

E-mail Address _____

Defendants Being sued

- 1 Snohomish County Sheriff Department
William Terveen
- 2 The Federal Bureau of Investigation
of Washington State; Donald M. Koiret
- 3 Snohomish prosecuting Attorney
Constance W. Crawley

Erin Allen



03/31/2022

B(2) The defendant(s)

Instance M. Crawley is a
citizen of the state of Washington

- Donald M. Voiret is a citizen
of the state of Washington.

Ezra Aiem

03/31/2022

